

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRITTANI DANETTE ATKINS,)	
)	
Plaintiff,)	Case No.: 1:21-cv-02408
)	
v.)	Honorable Robert M. Dow, Jr.
)	
HEALTHCARE REVENUE RECOVERY)	Magistrate Judge Young B. Kim
GROUP, L.L.C.,)	
)	
Defendant.)	

HRRG'S RESPONSE TO PLAINTIFF'S MOTION TO COMPEL

Healthcare Revenue Recovery Group, L.L.C. (“HRRG”) by and through its attorneys of Gordon Rees Scully Mansukhani, LLP, submits the following response to Plaintiff’s motion to compel.

1. Plaintiff filed a complaint against HRRG, alleging that HRRG violated the FDCPA by asking Ms. Atkins for her personal contact information over the telephone in March 2021, for allegedly hanging up on her without disclosing its identify in April of 2021, and for calling Ms. Atkins from a local telephone number.
2. Plaintiff filed a motion to compel on September 24, 2021, seeking documents of HRRG’s calls to Plaintiff. *See* docket entry #25.
3. Plaintiff’s motion to compel also sought an answer to Plaintiff’s Interrogatory No. 4, inquiring whether HRRG regularly attempts to collect, directly or indirectly, debts asserted to be owed to another. *Id.* at p. 2.
4. On October 8, 2021, HRRG produced supplemental responses to Plaintiff’s discovery requests and responsive documents.
5. On October 8, 2021, counsel for HRRG conferred with Plaintiff’s counsel over

the telephone discussing the supplemental production and next steps.

6. On October 8, 2021, Plaintiff's counsel agreed to withdraw Ms. Atkins' motion to compel.

WHEREFORE, HRRG respectfully requests that this Honorable Court deny Plaintiff's motion to compel if it is not promptly withdrawn, as HRRG has produced responsive documents and answered Interrogatory No. 4.

Respectfully submitted,

**GORDON REES
SCULLY MANSUKHANI, LLP**

Dated: October 8, 2021

/s/ Paul Gamboa

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Attorney for Defendant HRRG

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing **RESPONSE TO PLAINTIFF'S MOTION TO COMPEL** with the Clerk of Court using the electronic filing system, which will automatically send email notification of such filing to all attorneys of record.

Attorneys for Plaintiff

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Respectfully submitted,

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